UNITED STATES DISTRICT COURT



FOR THE DISTRICT OF NEW MEXICO

| In the Matter of the Searches of an item |) | 14 AUG 15 AM 9: 02 |
|--|--------|--------------------------------------|
| Known and Described as: |)) | Case No. 14-mr-407 CLERK-ALBUQUERQUE |
| Sheriff Thomas Rodella |) | |
| (Person and any effects on Person) |) | |

MOTION TO UNSEAL APPLICATION AND SEARCH WARRANT

The United States of America moves the Court to order the clerk to unseal the application and search warrant in the above captioned matter on the following grounds:

- 1. On or about May 29, 2014, this Court signed a search warrant authorizing a search of the above-styled item.
- 2. Thereafter, upon the motion of the United States, this Court entered an Order sealing the search warrant and supporting affidavits on the grounds that the underlying investigation was ongoing and that publication of the affidavits might jeopardize the integrity of the investigation.
- 3. The investigation has now concluded and a grand jury has returned an indictment.

There is, therefore, no further need for the above-referenced materials to remain sealed. The United States, therefore, respectfully requests that this Court order the clerk to unseal the application and search warrant in this case.

Respectfully submitted,

DAMON P. MARTINEZ United States Attorney

TARA C. NEDA

Assistant U.S. Attorney

P.O. Box 607

Albuquerque, New Mexico 87103

(505) 346-7274